amec

August 28, 2008
Project No. 13636

Mr. J. Ryan Benefield, P.E.
Chief, Hazardous Waste Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72218

Subject: Facility Investigation (FI) Workplan Supplement No. 3
Interim Measure – Waste Removal from the Drum Vault
Cedar Chemical Company Facility ("the Site")
West Helena, Arkansas
State EPA ID No. ARD990660649

Dear Mr. Benefield:

This Supplement is being submitted based on the preliminary findings of the on-going Facility Investigation. As outlined in Section 3.5 of the approved Facility Investigation Workplan dated March 2008, AMEC Geomatrix, Inc. (AMEC) has conducted an initial evaluation of the drum vault. During this evaluation, the drum vault was opened at four locations, and the contents of the vault were observed and sampled. The vault contained both crushed drums and intact drums in poor condition, and approximately 4 to 6 feet of water-saturated sandy backfill. The backfill was sampled at each location, and one sample of the water filling the vault was also collected. The analysis of these samples showed that concentrations of certain constituents of concern (COCs) exceed applicable screening levels in the backfill and the vault water (see Figure 1).

Due to the extremely poor condition of the drums that have likely been submerged under water for many years, the Group believes the vault contents should be characterized as a mass unit. It is also clear that the integrity of the drums, and likely the vault in which they are contained, will only deteriorate further with time. Given this, the drum vault has the potential to play an increasing role as a source of soil and groundwater contamination in the central plant area.

Based on our improved understanding of the construction and contents of the drum vault, the Group believes a source removal of the vault's contents in their entirety, with transportation of these contents for off-site disposal would be a prudent interim measure. Source removal of the vault contents would permanently reduce the risk and potential of future sources of contamination. The Group believes this interim measure will enhance the effectiveness of any permanent remedy that is selected and implemented at the Site.

We propose the following general approach for the removal of the drum vault and its contents.

- Empty the warehouse above the drum vault of all contents. Pack and label the contents and store them at another identified on-site location.
- Demolish the above-grade warehouse building and dispose of the material as construction debris. Please note that this demolition will be permanent—the Group does not propose to reconstruct or replace this building.

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- Break and remove the entire concrete slab covering the drum vault and dispose of the material.
- Dewater the drum vault. Containerize the decanted water for proper characterization, profiling, and off-site disposal.
- Consolidate the drums hulls and fill within the vault including addition of drying materials (e.g., bentonite, fly ash, etc) as needed to prepare the waste for transport. . Characterize the consolidated waste stream for profiling and proper off-site disposal.
- Excavate the consolidated waste stream, loading material into lined end-dump trucks or similar containers for transport off site.
- Clean the vault interior using high pressure water and a phosphate-based detergent, then collect the wash water and associated sediment for characterization, profiling and off-site disposal.
- Backfill the vault with clean, low permeability fill.

In summary, we believe that removal of the drum vault contents would be a prudent effort, and implementation of this interim measure should be undertaken as soon as it is practicable to do so. We propose to move forward with such a removal action, subject to your approval.

If ADEQ concurs with this general approach, we will begin working with a remediation contractor to develop more detailed plans for the actions described above. With your concurrence, we believe this work could be commenced on September 22, 2008, concurrent with the proposed additional well installation. This concurrent schedule would reduce manpower demands on both AMEC and the ADEQ.

If you have any comments regarding this report, please call me at (512) 494-0333.

Sincerely,
AMEC Geomatrix, Inc.

Kelly Beck, P.G.
Senior Project Manager

cc: ExxonMobil
Helena Chemical Company

Attachments:

Figure 1 Drum Vault Analytical Results